

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA :
:
-v- : 09 Cr. 722 (MGC)
:
PAUL GREENWOOD and :
STEPHEN WALSH, :
:
Defendants. :
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**SUPPLEMENTAL DECLARATION OF GLENN C. COLTON IN FURTHER SUPPORT
OF DEFENDANT STEPHEN WALSH'S PRE-DISCOVERY MOTIONS**

I, GLENN C. COLTON, do hereby declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

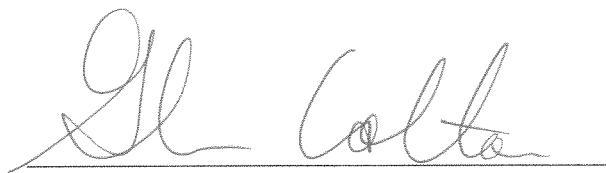
I am a partner in the law firm of Sonnenschein Nath & Rosenthal LLP (“Sonnenschein”), located at 1221 Avenue of the Americas, New York, New York, 10020, counsel for Defendant Stephen Walsh in the above-captioned action. I am duly admitted to practice in this Court. I submit this declaration in further support of Defendant Stephen Walsh’s Pre-Discovery Motions, and specifically to transmit to the Court a true and correct copy of the following document relevant to the “prosecution team” issue:

Reply Exhibit

4. Excerpt from the transcript of the trial in *United States v. Vilar*, 05 Cr. 621 (RJS), dated November 3, 2008, in which the Honorable Richard J. Sullivan rejected a “separate government” argument on the issue of whether prosecutors were required to produce 3500 materials in the possession of the SEC and not in the possession of the U.S.

Attorney's Office. Judge Sullivan ultimately ordered production of the 3500 materials in the SEC's possession.

Dated: September 13, 2010
New York, New York



Glenn C. Colton